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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA, ) CR 17-00191-JST-2  
Plaintiff, )  
v. ) STIPULATION AND PROPOSED ORDER TO  
KENNETH TAYLOR, ) CONTINUE INITIAL APPEARANCE OF  
SHARON RINGGENBERG, and ) DEFENDANT SHARON RINGGENBERG AND  
CRAIG SCOTT, ) TO EXCLUDE TIME UNDER THE SPEEDY  
Defendants. ) TRIAL ACT  
 )  
 )

The United States of America, by and through its counsel of record, and Sharon Ringgenberg, through attorney James J. Brosnahan, hereby STIPULATE and AGREE as follows:

1. On April 14, 2017, a federal grand jury in the Northern District of California returned a five-count Indictment alleging that Defendants Kenneth Taylor, Sharon Ringgenberg, and Craig Scott conspired to and that Kenneth Taylor and Sharon Ringgenberg did commit wire fraud with respect to a business providing fraudulent standby letters of credit and proof of funds statements, in violation of 18

1 U.S.C. §§ 1343 and 1349, and that Kenneth Taylor signed and filed false 2009 and 2010 federal income  
2 tax returns in which he failed to report income from the fraud scheme, in violation of 26 U.S.C. §  
3 7206(1).

4       2. On May 22, 2017, the Court issued a Protective Order regarding the discovery materials  
5 that the government plans to serve on Defendants. *See* Doc. No. 17.

6       3. On May 25, 2017, the government served initial discovery on all defendants. The  
7 government estimates that this production contains in excess of 70,000 pages of documents.

8       4. On May 26, 2017, Kenneth Taylor and Craig Scott, represented by their respective  
9 counsel, and the government, represented by Assistant U.S. Attorney Colin Sampson, appeared for an  
10 initial status hearing before United States District Judge Jon S. Tigar. The matter was continued to July  
11 21, 2017, in order for counsel to review recently-produced discovery.

12 Accordingly, the United States and Defendant Sharon Ringgenberg, hereby STIPULATE AND  
13 AGREE that the initial appearance of Sharon Ringgenberg before the District Court should be continued  
14 to Friday, July 21, 2017, at 9:30 a.m., and that time under the Speedy Trial Act be excluded from today  
15 until July 21, 2017, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (b)(iv) to allow for effective preparation  
16 of counsel, taking into account the exercise of due diligence.

Respectfully submitted,

**BRIAN J. STRETCH**  
United States Attorney

20 | Dated: June 5, 2017.

*/s/ Colin Sampson*  
COLIN SAMPSON  
Assistant United States Attorney  
GREGORY D. BERNSTEIN  
Trial Attorney

23 || Dated: June 5, 2017.

/s/ James J. Brosnahan  
JAMES J. BROSNAHAN  
Attorney for Defendant Sharon Ringgenberg

## **ORDER**

Pursuant to the Stipulation of the United States of America and Defendant Sharon Ringgenberg, and for good cause shown therein, IT IS ORDERED THAT the hearing currently set for June 16, 2017, is continued to July 21, 2017, at 9:30 a.m. It is further ORDERED THAT time under the Speedy Trial Act is excluded from today until July 21, 2017, pursuant 18 U.S.C. §§ 3161(h)(7)(A) and (b)(iv) because the ends of justice outweigh the interests of the public and Defendant Sharon Ringgenberg in a speedy trial, to allow for effective preparation of counsel, taking into account the exercise of due diligence, in order for the Defendant to review discovery served upon her by the United States and to prepare any pretrial motions, among other matters.

IT IS SO ORDERED.

Dated: June 6, 2017

THE HONORABLE JON S. TIGAR  
UNITED STATES DISTRICT JUDGE